

# **EXHIBIT “L”**

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**From:** GARY LIGHTMAN [garylightman@lightmanlaw.com](mailto:garylightman@lightmanlaw.com)  
**Subject:** Re: Deposition Notice for the Zakaria Defendants for 5/14/24 at 10 am  
**Date:** May 6, 2024 at 12:29 AM  
**To:** Patrick Healey [phealey@rebarkelly.com](mailto:phealey@rebarkelly.com), Cathleen Kelly Rebar [crebar@rebarkelly.com](mailto:crebar@rebarkelly.com)  
**Cc:** Laver, Seth L. [slaver@goldbergsegalla.com](mailto:slaver@goldbergsegalla.com), Joseph Ross [jross@goldbergsegalla.com](mailto:jross@goldbergsegalla.com), Gary Weiss [wgary4109@gmail.com](mailto:wgary4109@gmail.com), monipair [monipair@aol.com](mailto:monipair@aol.com), Sam Gross [charltonholdinggroupllc@aol.com](mailto:charltonholdinggroupllc@aol.com), Sam Gross [Scg1212@gmail.com](mailto:Scg1212@gmail.com), Sam Gross [publicdiamonds@gmail.com](mailto:publicdiamonds@gmail.com), Sam Gross [samrosinc@icloud.com](mailto:samrosinc@icloud.com), Kim DiTomaso [kditomaso@lightmanlaw.com](mailto:kditomaso@lightmanlaw.com), Glenn Manochi [gmanochi@lightmanlaw.com](mailto:gmanochi@lightmanlaw.com)

Patrick,

First, it is NOT improper for us to schedule a deposition of Zekaria even when there is a Motion pending for your law firm to withdraw. No stay has been entered, and you still are counsel for the Zekaria Defendants, and there is no rule or caselaw that we know of, that prevents us from continuing to take action in the lawsuit, notwithstanding your Motion to Withdraw. You do not state in your Motion that Zekaria is not paying you, so presumably you will be paid for your time.

Second, I asked you to give me dates for her re-scheduled deposition by Friday 4/26, which you failed to do.

We are willing to agree to re-schedule her 5/14 deposition, **provided** that you give us other available dates the weeks of May 13 and May 20 for her re-scheduled deposition. Otherwise, we intend to proceed forward with her deposition as scheduled on 5/14, absent a Court Order to the contrary.

All you need to do is give us other available dates in May when we can depose her, and “problem solved” for everyone.

Please be guided accordingly.

thx  
 Gary Lightman  
 cell 215-760-3000

On May 2, 2024, at 7:30 PM, Patrick Healey <[phealey@rebarkelly.com](mailto:phealey@rebarkelly.com)> wrote:

Gary:

Please be advised that we are not available for a deposition on May 14, 2024. It is improper for you to schedule a deposition of Ms. Zekaria when there is a Motion pending (and hearing scheduled) for our firm to withdraw as counsel. I am not available to discuss this matter until May 13 when I am back from vacation. I will speak to you then.

Pat Healey

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**Patrick J. Healey**  
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**From:** Gary Lightman <[garylightman@lightmanlaw.com](mailto:garylightman@lightmanlaw.com)>  
**Sent:** Monday, April 29, 2024 4:06 PM  
**To:** Patrick Healey <[phealey@rebarkelly.com](mailto:phealey@rebarkelly.com)>; Cathleen Kelly Rebar <[crebar@rebarkelly.com](mailto:crebar@rebarkelly.com)>  
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**Subject:** Deposition Notice for the Zakaria Defendants for 5/14/24 at 10 am

Patrick,

You are hereby served with plaintiff's Second Amended Notice of Oral Depositions of Daphna Zekaria, Esquire and Sokolski & Zekaria, PC (With Request for Production of Documents), re-scheduling the in-person depositions of the Zekaria Defendants to commence on **Tuesday, May 14, 2024, at 10:00 a.m.**, in the President's Board Room of the Country House at Bluestone Country Club, 711 Boehms Church Road, in Blue Bell, PA 19422 (the same room where the 4/2/24 deposition of Zekaria was started).

thx

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Gary Lightman  
cell 215-760-3000

attachment

We are pleased to announce that our New York office has relocated, and therefore our address has changed.

Please note, our New York office address is now:

256 West 36th Street  
Suite 900  
New York, NY 10018

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